



California County Superintendents Educational Services Association

1121 L Street, Suite 510, Sacramento, CA 95814 • P 916.446.3095 • F 916.448.7801 • www.ccsesa.org

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Federal Communications Commission

445 12th Street, SW

Washington, D.C. 20554

April 7, 2014

Dear Sir/Madame:

On behalf of the California County Superintendents Educational Services Association (CCSESA), I am writing to express our continued support of the E-Rate program, and to provide responses to the three areas which were addressed in the FCC's Public Notice: *Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization*, along with recommendations on how to most effectively spend the \$2 billion infusion of one-time found-funds.

Although the one-time infusion of \$2 billion will provide much-needed immediate repair and improvements, the need to provide effective access to technology for students throughout the country requires a larger ongoing investment. Technology has driven the information revolution and schools must adapt for students to be successful. We strongly urge that the program budget cap be increased to \$5 billion annually to better meet demand for service.

In previous correspondence to the FCC, we described the vital role that E-Rate has in connecting California's 58 counties to high-speed broadband. The demographics of the students county offices serve vary as widely as the geographic areas in which they are educated. County offices also work directly with school districts throughout the state on a daily basis, as county superintendents in California are required by law to annually review and approve each school district's budget and each district's Local Control and Accountability Plan.

Regarding the three issues on which the FCC is soliciting feedback, CCSESA offers the following comments:

- We recommend against creating a "set aside" amount for Priority Two funding to ensure that there is at least a minimum amount to be spent on internal connections. This rationing of dollars could result in insufficient funding of both priorities.

- We recommend against the distribution of E-Rate dollars on a per-pupil basis. Such an arrangement neglects to take into account the higher service rates of rural and small districts and counties. More often than not, the cost per-pupil of a remote area is higher than that of an urban or suburban area.
- We support efforts to minimize the cost and time burden to program administrators by streamlining administrative processes, especially the proposal to provide more equitable treatment for any application submitted by a consortia of local educational agencies.

Thank you for all of the work you have done, and will continue to do, to ensure that the highly successful E-Rate program undergoes the programmatic and fiscal changes required to ensure it meets the needs of a dramatically changing educational environment.



Peter Birdsall
Executive Director